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**MEMO ENDORSED**

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NEW JERSEY

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December 27, 2007

**BY TELEFAX**

(212) 805-7949

Honorable P. Kevin Castel  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 2260  
New York, NY 10007

Re: Giorgos B Maritime Ltd. v. Reynolds Shipping (USA) LLC  
07 Civ. 10387 (KPC)  
Our file: 2600026

Dear Judge Castel:

We are attorneys for plaintiff in this Rule B attachment action and we submit the following letter pursuant to Your Honor's November 21, 2007 Order and write to request an adjournment of the Rule 16 initial pretrial conference scheduled for Friday, January 4, 2008 at 11:00 a.m.

Plaintiff is a Greek corporation and was the owner of the M/T Giorgos B (the "Vessel"). In July of 2005, the defendant, a Texas based corporation, chartered the Vessel from plaintiff and subsequently failed to pay charter hire that was due and owing, failed to pay for other expenses incurred by plaintiff, and re-delivered the Vessel early causing plaintiff to incur lost profits.

Plaintiff commenced London arbitration to recover damages totaling \$1,256,432.00, inclusive of interest and costs (recoverable in London arbitration), and brought the instant Rule B attachment matter to obtain pre-judgment security.

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*Pretrial conference  
adjourned from  
Jan 4 to  
Jan 7, 2008 at 9:15 a.m.*

*SO ORDERED  
USDS  
12-27-07*

Plaintiff has been serving garnishees with the process of maritime attachment and garnishment since November 19, 2007, but has not yet obtained any security for its claims. Thus, to date, defendant has not appeared in this action, and plaintiff has not provided any notice of the action to defendant.

In light of the fact that defendant has not made an appearance in this matter, plaintiff respectfully submits that there is no reason to hold an initial pretrial conference in this matter at this time.

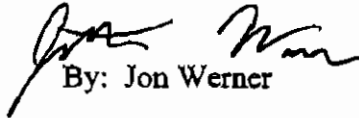
Until defendant has appeared no discovery would be necessary in this action, as the parties have agreed by the terms of their charter party, to arbitrate the underlying claims in London, England.

Accordingly, we believe this matter falls within the categories of actions exempted by local district court rule as inappropriate for Rule 16 pretrial conferences, and request the presently scheduled conference be adjourned for sixty (60) days.

We thank you for your attention to this matter.

Respectfully yours,

Lyons & Flood, LLP

  
By: Jon Werner

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